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# Monsanto

MONSANTO CHEMICAL CO.  
1700 South Second Street  
St. Louis, Missouri 63177  
Phone: (314) 622-1400

October 8, 1986

Mr. Robert L. Morby  
Chief Superfund Branch  
Waste Management Division  
U.S. Environmental Protection Agency  
776 Minnesota Avenue  
Kansas City, Kansas 66101

Dear Mr. Morby:

In it's last correspondence, your office requested to be kept informed of TCDD decontamination activity at Monsanto's J. F. Queeny Plant. This letter summarizes our current status and future activity as we discussed in our May 14, 1986 meeting.

O. H. Materials, Inc. has been selected to decontaminate the three floors of the ZZ Building found to have TCDD concentrations in excess of 1 ppb in accumulated dust and grit. The basement, first floor, and third floor will be decontaminated using a combination of vacuuming, scraping, and hydroblasting techniques identical to those successfully employed in the four previously completed buildings. OHM activity will begin October 13, 1986. Composite sample TCDD concentrations range from 1.1 to 2.0 ppb in these areas.

Hydroblast washwater will be treated in an O.H.M.- provided treatment system. Collected residues and contaminated cleanup gear will be packaged in fiber drums, overpacked in steel drums, and stored in a diked, enclosed, and secure facility. Our experience from the Phase I effort suggests that TCDD concentrations in the residues will be less than 1 ppb. Details of the treatment and storage facilities were described in the RCRA Part A Permit Revision submitted May 1, 1986 by Monsanto to the Missouri Department of Natural Resources who subsequently forwarded it to Region VII. It was approved by Messrs. D. Doyle and M. Reavis on September 2, 1986. Please note, however, that the storage area has been relocated from the QQ Building as described in the revision. A new storage location map, Part A Attachment 2, is attached. All other aspects of the storage system remain the same.



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Four of the decontaminated buildings will be dismantled as part of the plant's ongoing site consolidation program. The WW Building, however, will continue in operation. Building rubble will be deposited in a sanitary landfill as is plant practice for such structures. The current dismantling schedule is as following:

ZZ Building:	11/1/86
Q & QQ Building:	11/1 - 11/15/86
AA Building:	1987

As your are aware, EPA has not yet approved an incineration facility for disposal of the residues to be generated in the ZZ Building decontamination. Monsanto has previously indicated its interest in the opportunities provided by incineration and thermal treatment facilities operated or being considered by EPA. A cooperative effort in this area would benefit both EPA and Monsanto: EPA through demonstration of technology on a non-soil matrix and Monsanto through a more timely identification of an appropriate outlet for decontamination residue. Please keep us apprised of your programs and interests in this area.

Sincerely,

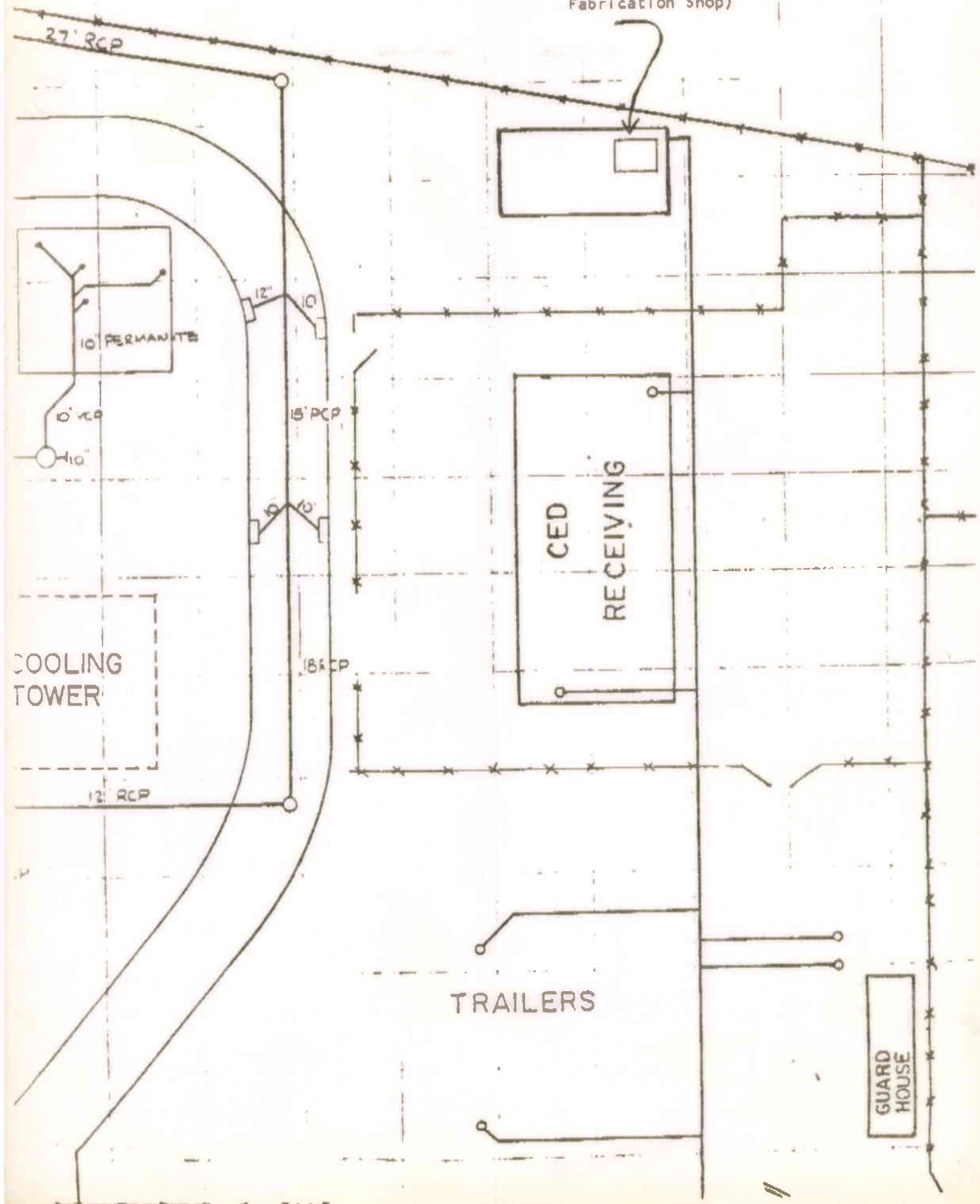
*Robert F. Boland PE*

Robert F. Boland, PE  
Environmental Protection  
Superintendent

/sah  
Attachments

bcc: F. B. Matthews  
K. M. Perdue  
M. R. Foreman - B3NA

ATTACHMENT 2 (revised, 10/8/86)

DIOXIN WASTE STORAGE AREA(Unnamed building; formerly the CED  
Fabrication Shop)

Monsanto

K. M. Perica, J. F. Queeny Plant, Ext. 1470

DATE

September 5, 1986

SUBJECT

RCRA -- PART A MODIFICATION, DIOXIN

REFERENCE

TO

File

R. F. Boland - E-11  
M. R. Foreman - B3NA  
R. T. Allen - G3WB  
T. R. Alvarez - B-5

After many weeks of discussions with ERA Region VII personnel, the Queeny Plant RCRA Part A application has been modified to accommodate dioxin waste storage and treatment. Therefore, the plant can proceed with the "ZZ" Building clean-up as planned.

There had been considerable reluctance on the part of the EPA to move on this request, primarily because it involved dioxin. As a result, numerous departments within the EPA became involved which delayed the entire review process. At one time they were insisting on a consent order; however, upon our continued questioning, the consent order was dropped.

I received verbal authorization on September 2, 1986, that the Part A was modified and all project work could now proceed. Mr. Dave Doyle, Permits/Enforcement Manager, and Mr. Mark Reavis were the primary contacts on this issue. Mr. Doyle reports to Mr. David Waggoner, RCRA/Air Director and Mr. Waggoner reports to Morris Kay, Regional Administrator. Doyle and Reavis both mentioned that a written response from them was not necessary.



K. M. Perica

/ad



JOHN ASHCROFT  
Governor

FREDERICK A. BRUNNER  
Director



STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176  
Jefferson City, MO 64102

*per*  
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Division of Environmental Quality  
Division of Geology and Land Survey  
Division of Management Services  
Division of Parks, Recreation,  
and Historic Preservation

FAX COVER SHEET

Waste Management Program  
(314) 751-3176  
FAX (314) 751-7869

TO:

Mark Rivas

Environmental Protection Agency

FAX #:

913-236-2845

Number of Sheet(s) Transmitted:

5

SUBJECT:

Monsanto-Queen's claim of interim  
status for dioxin storage

FROM:

Kathy Flippin

Waste Management Program

IF YOU HAVE ANY PROBLEMS WITH THIS  
TRANSMISSION, PLEASE CONTACT THE WASTE  
MANAGEMENT PROGRAM